

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

DR. TARRON RICHARDSON,

Plaintiff,

v.

Case No. 3:21-cv-45

CITY COUNCIL OF THE CITY OF  
CHARLOTTESVILLE, HEATHER HILL,  
LISA ROBERTSON, NIKUYAH WALKER,  
AND JOHN BLAIR,

Defendants.

**BRIEF IN SUPPORT OF MOTION FOR LEAVE TO FILE A VIDEO EXHIBIT**

Defendant Lisa Robertson (“Robertson”), by counsel, states as follows in support of her Motion for Leave to File Video Exhibits:

On January 26, 2022, Robertson filed her Motion to Dismiss and Brief in Support [ECF Docs. 14 and 15]. As part of Robertson’s Brief in Support of Motion to Dismiss, Robertson relies on video evidence obtained from the September 21, 2020 Charlottesville City Council Virtual Meeting where Plaintiff made statements that serve as the basis for his claim that his rights under the First Amendment and Article I, Section 12 were violated.

This video is referenced as an exhibit to Robertson’s Brief in Support of Motion to Dismiss as Exhibit C.

Robertson understands that this Court must grant her leave to physically file the exhibit on a flash drive, because the file is too large for the Court’s ECF system. A flash drive containing the video has been mailed to the Court on the same date this Motion and Brief in Support were filed.

For all of the foregoing reasons, Lisa Robertson, by counsel, respectfully requests that the Court grant her leave to physically file with the Court a flash drive containing the foregoing video evidence to be considered in support of her Motion to Dismiss.

**LISA ROBERTSON**

By Counsel

s/Melissa Y. York

David P. Corrigan (VSB No. 26341)

Melissa Y. York (VSB No. 77493)

Counsel for Lisa Robertson

Harman, Claytor, Corrigan & Wellman

P.O. Box 70280

Richmond, Virginia 23255

804-747-5200 - Phone

804-747-6085 - Fax

dcorrigan@hccw.com

myork@hccw.com

**C E R T I F I C A T E**

I hereby certify that on the 26th day of January, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Kevin E. Wilson (VSB No. 80033)  
Law Office of Kevin E. Wilson, PLLC  
801 Wayne Avenue, Suite 400  
Silver Spring, MD 20910  
703-775-0484 – Phone  
kevin@kevinwilsonlaw.com

Keith B. French (Tex. Bar No. 24115073)  
Keith B. French Law, PLLC  
2010 E. Broadway St., Suite 132  
Pearland, TX 77581  
832-243-6153 – Phone  
832-243-1927 – Fax  
kfrench@peoplefirstfirm.com

Voland Brand (Texas Bar No. 24073253)  
Brand Law PLLC  
3636 N. Hall Suite 610  
Dallax, TX 75219  
214-932-1472 – Phone  
214-932-1473 – Fax  
volney@brandlaw.us.com

Richard H. Milnor (VSB No. 14177)  
Zunka, Minor & Carter, Ltd.  
414 Park Street  
P.O. Box 1567  
Charlottesville, VA 22902  
434-977-0191 – Phone  
434-977-0198 – Fax  
rmilnor@zmc-law.com

s/Melissa Y. York  
David P. Corrigan (VSB No. 26341)  
Melissa Y. York (VSB No. 77493)  
Counsel for Lisa Robertson  
Harman, Claytor, Corrigan & Wellman  
P.O. Box 70280  
Richmond, Virginia 23255  
804-747-5200 - Phone  
804-747-6085 - Fax  
dcorrigan@hccw.com  
myork@hccw.com